

# Morgan Lewis

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March 11, 2021

## Via ECF

The Honorable Philip M. Halpern  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street, Room 1950  
New York, NY 10007

Application granted. The March 16, 2021 conference is adjourned until March 24, 2021 at 12:00 p.m. At the time of the scheduled conference all parties shall call (888) 398-2342; access code: 3456831. The Clerk is directed to terminate ECF No. 59.

SO ORDERED.



Philip M. Halpern, U.S.D.J.

Dated: White Plains, NY  
March 12, 2021

**Re: *Humberto Ramirez v. Marriott International, Inc., et al.*, 20-cv-02397-PMH  
Request to Adjourn March 16, 2021 Local Rule 37.2 Pre-Motion Conference  
One Week to March 23, 2021**

Dear Judge Halpern:

We represent Defendants Marriott International, Inc. and The Ritz-Carlton Hotel Company, LLC ("Defendants") in the above-referenced matter. Pursuant to Rule I(C) of Your Honor's Individual Practices in Civil Cases, we write to respectfully request a one-week adjournment of the Local 37.2 pre-motion conference from March 16 to **March 23, 2021**, in order to accommodate Mr. Ramirez's schedule and complete his deposition.

Mr. Ramirez, through his counsel, has stated that, due to his current job, he is only available on Tuesdays. As they did for the first day of his deposition, Defendants would like to accommodate Mr. Ramirez' schedule. While the parties have been working to find a date since our last conference with Your Honor, the nearest Tuesday on which Mr. Ramirez was and is available is Tuesday, March 16. Mr. Ramirez's counsel confirmed yesterday afternoon that Mr. Ramirez is available to start on March 16 at 9:00 AM EST. Given Mr. Ramirez's limited availability, Defendants are uncertain of when he will be available again, and, therefore, wish to conclude his deposition as soon as possible.

In light of the Court's ruling that Defendants "shall have an additional 2.5 hours of deposition time with Plaintiff Ramirez for a total of 8 hours" (ECF 2/23/2021 Minute Entry), the deposition will likely not be completed by the time of the scheduled conference, which is also on March 16, at 10:30 AM EST. Moreover, Defendants believe that, in the interests of judicial economy, it would be best to complete Mr. Ramirez' deposition before the next conference, in case any additional issues need to be raised with the Court.

Accordingly, Defendants respectfully request that the March 16 conference be adjourned to March 23, 2021, or any other date that is convenient for the Court.

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This is Defendants' first request for an adjournment of the March 16 pre-motion conference. This request will not affect any other scheduled dates in this matter. Plaintiff does not consent to Defendants' request and indicated a preference "to move forward with the dual settings."

Respectfully submitted,

/s/ Christopher A. Parlo  
Christopher A. Parlo  
Attorney for Defendants